

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by BellSouth )  
Telecommunications, Inc., Regarding )  
The Operation of a Telecommunications )  
Company by Miami-Dade County in )  
Violation of Florida Statutes and )  
Commission Rules )

Docket No. 050257

**MIAMI-DADE COUNTY'S RESPONSE TO BELL SOUTH  
TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR ADMISSIONS**

Miami-Dade County (the "County"), by and through its undersigned counsel, hereby serves its Response to BellSouth Telecommunications Inc.'s First Request for Admissions, pursuant to Fla. R. Civ. P. 1.370. The County (i) objects to this request and any subsequent discovery requests propounded in this matter, given the ongoing discovery provided in *BellSouth Telecommunications, Inc. v. Miami-Dade County, Fla.*, Case No. 02-28688 CA 03 (Fla. 11th Cir. Ct. filed Nov. 12, 2002), (ii) does not waive its right to object to future discovery requests, and states:

DOCUMENT NUMBER-DATE

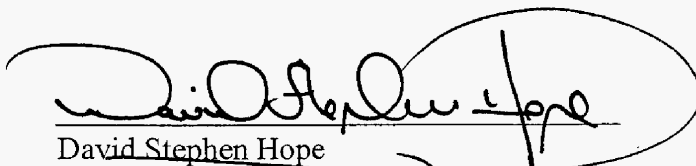
06608 JUL 13 2002

FPSC-COMMISSION CLERK

1. The County admits to Request Nos. 1, 2, 3, 4 and 5.

Respectfully submitted,

Robert A. Ginsburg  
Miami-Dade County Attorney

A handwritten signature in black ink, appearing to read "David Stephen Hope", is enclosed within a large, hand-drawn oval. The signature is fluid and cursive.

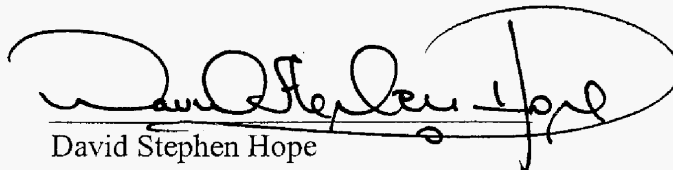
David Stephen Hope  
Assistant County Attorney  
Florida Bar No. 87718  
PO Box 592075 AMF  
Miami, Florida 33159-2075  
Tel: (305) 876-7040  
Fax: (305) 876-7294

Jean L. Kiddoo  
Joshua M. Bobeck  
Danielle C. Burt  
SWIDLER BERLIN LLP  
3000 K St., NW, Suite 300  
Washington, DC 20007  
Tel: 202-424-7500  
Fax: 202-424-7647

Counsel for Miami-Dade County

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this *11th* day of July, 2005, to: *Nancy B White, Esq.* and *Sharon R. Liebman, Esq.*, c/o Nancy H. Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Suite 400, Tallahassee, Florida, 32301; and *R. Douglas Lackey, Esq.*, BellSouth Telecommunications, Inc., 675 West Peachtree Street, N.E., Suite 4300, Atlanta, Georgia 30375.



David Stephen Hope  
Assistant County Attorney